



**North Carolina Department of Natural and Cultural Resources  
State Historic Preservation Office**

Ramona M. Bartos, Administrator

Governor Roy Cooper  
Secretary Susi H. Hamilton

Office of Archives and History  
Deputy Secretary Kevin Cherry

January 9, 2018

Dave Swearingen  
Chief, Gas Branch 4  
Federal Energy Regulatory Commission  
888 First St. NE  
Washington, DC 20426

[david.swearingen@ferc.gov](mailto:david.swearingen@ferc.gov)

RE: Revised Programmatic Agreement for the ACP/Supply Header Projects -- Final Review  
Multi County, ER 14-1475

Dear Mr. Swearingen:

Thank you for your January 5, 2018, email providing us with the revised Programmatic Agreement (PA) for the above-referenced undertaking, the supporting appendices, and directing us to comment by noon on January 9, 2018. As noted in our email reply to Mr. Bowman, we were unable to meet this deadline due to delays created by the extreme weather in our area that affected the schedules of key reviewers. Having reviewed the several documents, we provide below comments on the revised PA and enclose a marked up copy of the *Plan for the Unanticipated Discovery of Historic Properties or Human Remains During Construction in North Carolina* for adoption.

We strongly encourage FERC to include the North Carolina Commission of Indian Affairs as a party to the PA as either a concurring party or stakeholder. While we understand that the Commission may not have responded to notices provided to it, we believe that as a clearinghouse for the several state-recognized tribes in North Carolina, the Commission should be afforded this role in the PA.

We would very much like to see more definitive language in Stipulation IV. – Public Education to include in North Carolina the following educational efforts to inform the public about the results of the survey, evaluation, and treatment of historic properties in North Carolina, whether or not a property is adversely affected. Given that such a great deal of time and expense has gone into the identification and evaluation of historic properties, and, in some cases, recovery of data from archaeological sites, it seems only right that the results of these efforts be shared with the public. Thus, we propose that a travelling exhibit be developed, highlighting those historic properties in North Carolina that were identified, evaluated, and treated as part of this project, and make that exhibit available for use at state historic sites and parks; including, but not limited to Halifax State Historic Site, Lumber River State Park, and a public library in Northampton County.

Further, as part of the treatment of historic artifacts gathered in North Carolina and not released by the private owners to the applicants' consultants, these should be curated in the Research Center of the Office of State Archaeology (OSA), in accordance with its treatment and storage guidelines and standards, including storage fees.

Thank you for consideration of our recommendations to revise the PA and the discovery plan. We look forward to receipt of the final version of the PA and will give it full and careful consideration.

Sincerely,



Ramona M. Bartos  
Deputy State Historic Preservation Officer

Enclosure: Plan for the Unanticipated Discovery – North Carolina

cc: Dr. Kevin Cherry, SHPO  
Ellen Armbruster, FERC  
Kevin Bowman, FERC  
Greg Richardson, NCIA  
John Mintz, OSA

[kevin.cherry@ncdcr.gov](mailto:kevin.cherry@ncdcr.gov)  
[ellen.armbruster@ferc.gov](mailto:ellen.armbruster@ferc.gov)  
[kevin.bowman@ferc.gov](mailto:kevin.bowman@ferc.gov)  
[greg.richardson@doa.nc.gov](mailto:greg.richardson@doa.nc.gov)  
[john.mintz@ncdcr.gov](mailto:john.mintz@ncdcr.gov)